

COURTENLY M. PRICE
Vice President
CHEMSTAR

**American
Chemistry
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December 18, 2001

Via US Mail and e-mail

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

**Re: Rubber and Plastic Additives (RAPA) Panel, Consortium No.
HPV Chemical Challenge Program Submission
Hindered Phenols Category
Category Justification and Testing Rationale**

Dear Governor Whitman:

The RAPA Panel of the American Chemistry Council is pleased to submit the subject documents to EPA's HPV Chemical Challenge Program (Program) as our test plan for a category covering eight of the 39 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Bayer Corporation, Ciba Specialty Chemicals Corporation, Crompton Corporation, Flexsys America L.P., The Goodyear Tire & Rubber Company, The Lubrizol Corporation, Noveon, Inc., R.T. Vanderbilt Company, Inc., and UOP, LLC.

In this submission, please find the *Category Justification and Testing Rationale* for the category *Hindered Phenols*. Eight chemicals in the category are sponsored in the Program, as listed in the following table:

RAPA Panel Hindered Phenols Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
68457-74-9	phenol, isobutylenated methylstyrenated
61783-44-1	phenol, styrenated
96-09-5	4,4'-thiobis-6-(t-butyl-m-cresol)
85-60-0	4,4'-butylidenebis(6-t-butyl-m-cresol)
79-96-9	phenol, 4,4'-(1-methylethylidene)bis[2,(1,1-dimethylethyl)]-
7786-47-6	phenol, 2,2'-methylenebis(4-methyl-6-nonyl)
68610-31-5	phenol, 4-methyl-, reaction products with dicyclopentadiene and isobutylene



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RAPA Panel Hindered Phenols Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
27676-00-1	1,3,5-tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione

Data for three additional chemicals in the category, listed in the table below, are used to support the conclusions reached for the category.

RAPA Panel Hindered Phenols Category Additional Chemicals in the Category	
CAS Number	Compound Name
128-37-1	2,6-di-tert-butyl-p-cresol
20325-79-3	(octadecanoxycarbonyl ether)phenol
6683-19-8	tetrakis-(methylene-(3,5-di-tert-butyl-4-hydrocinnamate)methane

In addition to the *Category Justification and Testing Rationale*, please also find attached robust summaries contained in IUCLID-formatted documents for each of the eight sponsored chemicals and the three supporting chemicals in the category.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtl@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments

Cc: C. Auer, EPA/OPPT
B. Leczynski, EPA/OPPT
RAPA Panel (without attachments)
S. Russell, ACC (without attachments)